

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
WNI 19-025504	
LOGS Legal Group LLP 14000 Commerce Parkway, Suite B Mount Laurel, NJ 08054 (856) 793-3080 Kathleen M. Magoon - 040682010 ATTORNEYS FOR WELLS FARGO BANK, N.A.	
In Re:	Case No.: 19-12542-VFP
MARC ROBERT HUECK AND CARESSE PATTY ANN HUECK, DEBTORS	Judge: HONORABLE VINCENT F. PAPALIA Chapter: 13

The undersigned, Shapiro & DeNardo, LLC, attorneys for the Secured Creditor, Wells Fargo Bank, N.A., the holder of a Mortgage on Debtors' property located at 38 Overlook Avenue, Little Falls, NJ 07424, hereby objects to the Confirmation of the Debtors' proposed Modified Chapter 13 Plan, ECF # 86, on the following grounds:

1) Debtors' proposed Modified Chapter 13 Plan does not provide for the curing of the full amount of the mortgage arrearage accrued at the time of the Bankruptcy filing to Secured Creditor. Debtors' Plan proposes to pay Secured Creditor \$0.00. Secured Creditor is owed pre-petition arrearage in the amount of \$1,840.86.

2) Debtors' proposed Modified Chapter 13 Plan does not provide for the Secured Creditor to receive distributions with a value equal to the allowed amount of its claims required by 11 U.S.C.1325(a)(5)(B)(ii).

3) Debtor's Proposed Chapter 13 Plan does not specifically state the amount of the ongoing monthly post-petition payments, which are currently \$102.27. Secured Creditor requires full monthly post-petition payments owed to Secured Creditor under the terms of the Note and Mortgage.

4) Further, the Plan does not include this objecting Secured Creditor under any section of the Debtor's Bankruptcy Plan.

WHEREFORE, Wells Fargo Bank, N.A. respectfully requests that the Confirmation of Debtors' Modified Chapter 13 Plan be denied, and that the Debtor be required to file an Amended Chapter 13 Plan providing for full payment of arrears due to the Secured Creditor.

LOGS LEGAL GROUP LLP

By: /s/Kathleen M. Magoon
Kathleen M. Magoon - 040682010
Elizabeth L. Wassall - 023211995

Dated: July 10, 2021

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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In Re:

MARC ROBERT HUECK AND CARESSÉ PATTY
ANN HUECK,
DEBTORS

Case No.: 19-12542-VFP

Judge: HONORABLE VINCENT F. PAPALIA

Chapter: 13

CERTIFICATION OF SERVICE

I, Ryan Cartrette the undersigned

1. ☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Kathleen M. Magoon, Esquire and Elizabeth L. Wassall, Esquire, who represents the Secured Creditor in the above-captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On _____, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

- Notice of Objection to Confirmation

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Signature

Dated: 07/12/2021

/s/ Ryan Cartrette
Printed Name

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Leonard Singer 36 Mountain View Blvd. Wayne, NJ 07470		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Marie-Ann Greenberg 30 Two Bridges Road Suite 330 Fairfield, NJ 07004		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Marc Robert Hueck and Caresse Patty Ann Hueck Debtors 38 Overlook Avenue Little Falls, NJ 07424		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.